

2/25/2016

Agenda for Q1 CDPHE Oversight Mtg

Mike B. (me)
Al Garcia
Mike Harris
David Kury
Janet (permits)

Colorado Enforcement Case Status

- Century Communities - penalty being calculated
 - Keller - penalty negotiations
 - Chatfield IV - penalty being determined * email him the entity name
 - Kriebitz - will be a penalty
 - Guildner Pipeline - ongoing info request/gathering
 - Noble (oil spill) - penalty being determined
 - Louisville - penalty being determined
 - Fowler - AEC
 - Jensen - "
 - Wray - sampling in this week
 - Colorado Springs - ongoing
- Send # gravel universe:
500 (200 are combined process + GW)
- near renewal of this GP

SAF Call in works

QACR process - Mike appreciates the follow-up

- * Send him the next QACR over

London Mine - 1.1 mill penalty hearing, ALT upheld it, to be appealed again
inactive gold mine, > ~~London~~ MGP into a cadmium-contaminated stream
No money to fix problems

FMS is almost ready to send to me for comment → 2 week turn-around
Cleans up organizational changes

ERG fleshed out more w/ categories of violations

Org change: data mgmt group

- * Set up call w/ Mike re: data mgmt. next week

David - Is what he & Greg gives me sufficient as complaint follow-up?

- PT IV surveys - do we have "lessons learned" summaries or stuff we find in particular towns that can be passed along to CDPHE inspectors, which they can pass along to miners?

MS4 general permit to be issued in next 2-3 weeks

- * Send Janet 2 items: - proposed RB Water Division
- actions right now
- all of RB

- * Burlington - what's status? (Conifer?) (CCA penalty) issued 9/23/15

metabolism and energy - (metabolism) unit 1 -

Prüfung: 2. Klausur - 9.12.2015

Monte Carlo - 1945

$\frac{1}{2} \times 1000 \times 10^{-3} \times 10^{-3} = 0.5 \times 10^{-3} \text{ m}^3$

29 - Drawing

DA - nelson -

1. Principles of Management

Date: 09-07-2020

1978-1979 - 1979-1980

1. The first part of the paper is a review of the literature on the topic of the paper.

Learn to Organize Change

2000-2001

Don't know what I'm doing

2. Survival / Lebensdauer = $\frac{\text{Lebensdauer}}{\text{Anzahl der Individuen}}$

Answer: 2.2

10/10/1919 - 10/10/1919

2) $\text{EOP}^{\text{K}} \text{Kugler (March 2018)}$ (5.7) $\frac{1}{2} \cdot 5 \cdot 17 \cdot 17 = 722.5$

CO QMCR Review

February 2016

Henderson - Should the permit schedule violations from 6/2015 and 5/2015 be resolved in 1C15?

Mulberry - Has WRCD considered use of a manual resolution code for subsequent quarters (EX15 04, etc) to show that the tox violn is not continuing?

Northglenn - Why does the RUC continue beyond 2003 indefinitely? If system doesn't automatically resolve after 2 yrs, how about a manual code?

Security

Trinidad - Has the City submitted the missing monitoring data for metal? & temp (8/2015)

Upper Fraser Valley TP - Has muni submitted missing toxicity data from Dec 2013? If so, WOLD could manually override "N"

City of CoSprings - CO5000004 - Has the missing monitoring pbr from 6/15 been submitted?

Treatment, Storage & Disposal (CO0042064) - Have the missing pesticide monitoring data been submitted from 12/2014?

Blue River WWTF - Has City submitted missing monitoring data from 8-9 of 2015?

Del Norte WWTF - 090 for BMR overdue, 8/2015. Submitted?

~~Public~~ Regional WW Rec Facility - Has missing monitoring data for TSS been submitted for 9/2015?

2015

2015-2016

2015-2016

2015-2016

2015-2016

2015-2016

2015-2016

2015-2016

2015-2016

2015-2016

2015-2016

2015-2016

2015-2016

2015-2016

Colorado QNCR - 4th Quarter 2015 Annotations

QNCR Run Dated 12/7/2015

(Excluding Federal Facilities and Pretreatment Violations)

POTW FACILITIES

Cherokee Metro District - COX048348

The Division entered into a Compliance Order on Consent with Cherokee Metro on May 14, 2014 that includes a compliance schedule to address the total dissolved solids violations. The violations are being addressed through a combination of source reduction, public education, and the installation of new treatment. (Note: Cherokee Metro is also pursuing a water quality standards change or variance from the Water Quality Control Commission.) Due to the difficulty and cost of treating wastewater for total dissolved solids, final construction of all treatment technologies are not scheduled to be completed until 2022.

Delta WWTF - CO0039641:

Not on December QNCR

The City of Delta submitted a permit modification application signed August 24, 2015 stating over the past few years all of the City's Categorical Industrial Users that discharge to the City of Delta Wastewater Treatment Plant have either closed or have left the area. In the spring of 2013 the City submitted an application for delisting to EPA Region VIII. EPA granted the delisting status from the requirements of Delta's approved pretreatment program and notified the City in a letter dated July 22, 2015. The City has committed to continued monitoring of any Significant Industrial Users and will continue an industrial user inventory to identify any potential new significant industrial users that may have an adverse effect on the treatment facility. The permit modification request is still in process with the Division's Permit Section. The Division will continue to monitor the progress of the City and will address any concerns accordingly.

Evans WWTF - CO0020508:

The City of Evans treatment facility was adversely impacted by the historic September floods of 2013, the effects of which the City reports have impacted their ability to meet BOD effluent limitations. The City provided a comprehensive report outlining the damages, including a loss of aeration capability with damage to five of 13 surface aerators, loss of transfer piping between lagoons (currently utilizing an open trench between lagoon cells until repairs are completed), erosion of embankments, collection of settlement and debris from flood waters, etc. The City has taken action to repair the essential aspects of the headworks and return to normal operations, while exploring future long term solutions for the facility to attain consistent, reliable effluent discharge within the limits set forth in the permit. The City is actively pursuing funding options with the Division's Grants and Loans Unit and has applied for flood relief monies from the State in the amount of \$1 million, as well as pursuing additional grants and loans. The City has implemented a rate increase to help fund the long term plans for expanding and combining the facility with the City's



COLORADO
Department of Public
Health & Environment

Colorado QNCR - 4th Quarter 2015 Annotations

QNCR Run Dated 12/7/2015

(Excluding Federal Facilities and Pretreatment Violations)

Hill-N-Park treatment facility as well. The Division is continuing to monitor progress and work with representatives of the City to identify the most effective and efficient means of addressing the need for interim measures while allowing for progress in the long term planning of an upgraded facility.

Mulberry WWTP - CO0026425:

The triggering violation is a single event violation that was entered by the Division for the facility's failure to initiate an automatic compliance response (i.e., accelerated testing, TIE/TRE) to a WET test failure. Since it is not possible to perform the accelerated testing given the amount of time that has passed, this is a onetime violation and not an ongoing violation. The Division plans to monitor whether this violation continues to trigger SNC status on future QNCRs and, if it does, the Division will evaluate how the violation was coded in ICIS, as this violation should not be appearing as ongoing SNC.

Rocky Ford WWTF - CO0023850:

The Division issued a Notice of Violation / Cease and Desist Order to the City of Rocky Ford on April 27, 2010. The facility has been in the process of completing necessary upgrades to the wastewater lagoons. The Division sent an approval letter for Final Plans and Specifications for Construction dated May 27, 2015. The lagoon improvements are nearing completion. Settlement discussions with the City will commence shortly thereafter. The Division will continue to monitor the facility's progress and escalate enforcement concerns accordingly.

Erie North Water Reclamation Facility - CO0048445:

The facility identified an error in the spreadsheet utilized to calculate the rolling average for arsenic and cyanide. Additionally the copper data provided was incorrect with regards to reporting Below Detection Level which incorrectly flagged as a violation. The facility has submitted revised DMRs and the effluent exceedances have been resolved.

NON-POTW FACILITIES

Fort Morgan Facility - CO0041351:

With regards to the effluent violations, the Division manually corrected the RNC status to "Resolved Pending" because of the existing 2012 Compliance Order on Consent, which outlines enforceable milestones for Western Sugar to comply with the fecal coliform and BOD₅ effluent limitations of the CDPS permit.

The Division is working to address the outstanding compliance schedule item CS015 "Commence required Work." Because Western Sugar had concerns regarding the



COLORADO
Department of Public
Health & Environment

Colorado QNCR - 4th Quarter 2015 Annotations

QNCR Run Dated 12/7/2015

(Excluding Federal Facilities and Pretreatment Violations)

permitting approach with the renewed discharge permit the ultimate solution to address the effluent violations was unknown at the time of developing the Compliance Order on Consent No. IO-120228-1 (the "COC"). The COC gave Western Sugar the option to submit a permit amendment application or a wastewater treatment plan in 2014. Western Sugar chose to submit the permit amendment application to apply for alternate points of compliance, which would have made the remainder of the compliance schedule (including item CS015) obsolete. However, the Division found Western Sugar's permit amendment application incomplete and attempted to work with Western Sugar to find a viable solution- either in the permitting context or through the COC. In the summer of 2015 Western Sugar advised the Division that it intended to convert the facility into a non-discharging facility by making various modifications to recycle production water. Western Sugar has yet to submit this plan and the Division has advised Western Sugar that if a plan and timeline are not submitted by January 18, 2016 then the Division will consider its enforcement options.

London Water Tunnel- CO0038334:

The Division issued two recent NOV/CDOs citing London Mine LLC for violations of the permit effluent violations for zinc and cadmium (Notice of Violation/ Cease and Desist Order No. IO-130321-1 issued to the London Mine LLC on March 21, 2013 and Notice of Violation/ Cease and Desist Order No. IO-150730-1 issued to the London Mine LLC, the Estate of Benjamin Wright, and the personal representative of the estate and manager of the LLC on July 30, 2015). In response to both of these enforcement actions the London Mine LLC claimed a third party was liable for the pollutant discharges at the Water Tunnel. The Division attempted to negotiate a settlement with the London Mine LLC which would have included a requirement to treat the discharge and/or facilitate a sale of the property however, these discussions were unsuccessful. The third party liability claim was a major contributing factor in the failed settlement negotiations so the Division set the matter for a hearing with the State of Colorado Office of Administrative Court (AOC). On November 19, 2015, an administrative law judge ruled that the London Mine LLC was liable for permit effluent violations- ultimately resolving the question of liability. On December 15-16, 2015, the AOC held a hearing regarding the civil penalty that the Division imposed on the London Mine LLC for violations cited in the 2013 NOV/CDO. That decision is pending and will likely be a significant factor in determining the path forward. The Division is aware of parties interested in purchasing the London Mine property that also have the resources and willingness to address the effluent quality and the Division will continue to work with these parties to facilitate a sale of the property which is the likely solution to the violations.

Platoro Mine Project - CO0038954:

The violation code was entered incorrectly by the Division. While a WET test was reported below the IWC, the parameter is report only until 2016 so it's not an effluent



COLORADO
Department of Public
Health & Environment

Colorado QNCR - 4th Quarter 2015 Annotations

QNCR Run Dated 12/7/2015

(Excluding Federal Facilities and Pretreatment Violations)

violation. That said there was a failure to notify the Division and conduct automatic compliance, which is a monitoring violation requiring the code C0021. The violation code has been corrected in ICIS.



COLORADO
Department of Public
Health & Environment



Environmental Protection Agency
Integrated Compliance Information System
 COORDINATOR'S QUARTERLY NONCOMPLIANCE REPORT *****QNCR*****
 GUIDE TO VIOLATION AND RNC CODES

RNC DETECTION CODES

Violation Type	RNC Detection Code	Short Description
DMR Non-Receipt (D80, D90)	K	RPT - Non-receipt Violation, Non-Monthly Average
	N	RPT - Non-Receipt of DMR/Schedule Report
Effluent (E90)	A	ENF - Enforcement Order
	P	ENF - Enforcement Order, Non-Monthly Average
	T	TRC - TRC Limitations Exceeded
	V	EFF - Other Violation with TRC
	C	CHR - Chronic Violation
	R	TRC - TRC Limitations Exceeded, Non-Monthly Average
	U	EFF - Other Violation with TRC Non-Monthly Average
	H	CHR - Chronic Violation, Non-Monthly Average
	Y	TRC - Manual TRC
	X	EFF - Manual Other Violation with TRC
	Z	CHR - Manual Chronic
Schedule Violations (C10, C20, C30, C40)	S	SCH - Schedule Violation
	N	RPT - Non-Receipt of DMR/Schedule Report
Single Event	B	DIS - Manual 2A4 - Pass-Through
	E	DIS - Manual 2F - Permit Narrative
	D	DIS - Manual Other
	F	DIS - Manual 2G - Violation of Concern
	G	DIS - Manual 2A1 - Effluent Violation
	I	DIS - Manual 2A2 - Unauthorized Bypass
	J	DIS - Manual 2A3 - Unpermitted Discharge
	Q	DIS - Manual 2B - Pretreatment
	W	DIS - Manual 2E - Deficient Report



Environmental Protection Agency
Integrated Compliance Information System
COORDINATOR'S QUARTERLY NONCOMPLIANCE REPORT ***QNCR*******
GUIDE TO VIOLATION AND RNC CODES

RNC RESOLUTION CODES

	RNC Resolution Code	Short Description
Noncompliant (NC)	1	NC - Unresolved RNC
	A	NC - Manual Unresolved RNC
Resolved Pending (RP)	3	RP - Due to Formal Enforcement Action Final Order with Compliance Schedule
	4	RP - In Compliance with Formal Enforcement Action Final Order Requirement
	7	RP - Manual RP - In Compliance with Formal Enforcement Action Order Requirement
	8	RP - Manual Due to Formal Enforcement Action Formal Order
Resolved (RE)	0	RE - Two Years Past Detection (System Administratively Resolved)
	2	RE - Back into Compliance
	5	RE - Resolved RP by NPDES Closure of Enf. Action Final Order with Comp. Schedule
	6	RE - Manual Resolution by Enforcement Action
	9	RE - Manual by Back into Compliance/Administratively Resolved
	B	RE - Manual by EPA/State/Tribal Action



Environmental Protection Agency
Integrated Compliance Information System
COORDINATOR'S QUARTERLY NONCOMPLIANCE REPORT *****QNCR*****
GUIDE TO VIOLATION AND RNC CODES

SCHEDULE VIOLATION CODES

Schedule Violation Code	Violation Indicator Type
C10	Schedule Event reported late
C20	Schedule Event achieved late but reported
C30	Schedule Event unachieved but reported
C40	Schedule Event unachieved and not reported



Environmental Protection Agency
Integrated Compliance Information System
COORDINATOR'S QUARTERLY NONCOMPLIANCE REPORT ***QNCR*******
GUIDE TO VIOLATION AND RNC CODES

RNC STATUS CODES

Permit QNCR Status Code	Code Description
C	Compliant (Manual Only)
D	SNC DMR Non-Receipt Violation
E	SNC Effluent Violation Monthly Average
N	RNC Violations Only
P	Resolved Pending
Q	Resolved Pending - Compliance Schedule (manual only)
R	Resolved
S	SNC Schedule Event Violation
T	SNC Schedule Report Violation
U	Unknown
V	Non-RNC Violations
X	SNC Effluent Violation Non-Monthly Average



Environmental Protection Agency
Integrated Compliance Information System
COORDINATOR'S QUARTERLY NONCOMPLIANCE REPORT *****QNCR*****
GUIDE TO VIOLATION AND RNC CODES

DMR VIOLATION CODES

Violation	Indicator Type	Code
DMR Non-Receipt Violation	DMR, Limited - Overdue	D90
	DMR, Monitor Only - Overdue	D80
Effluent Violation	DMR, Limited - Numeric Violation	E90

